

July 22, 2019

**Via ECFS**

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

**Re: Written Ex Parte Communication - Implementing Kari's Law and Section 506 of RAY BAUM'S Act, PS Docket No. 18-261; Inquiry Concerning 911 Access, Routing, and Location in Enterprise Communications Systems, PS Docket No. 17-239**

Dear Ms. Dortch:

Avaya, Inc. ("Avaya"), through undersigned counsel and pursuant to Section 1.1206 of the Federal Communications Commission's ("Commission") rules<sup>1</sup> and consistent with prior filings, encourages the Commission to continue its technology neutral approach to revising 911 requirements by refraining from adopting rules that mandate legacy systems. Such rules may impede the development of innovative, cost-effective solutions.

Avaya applauds the Commission's work implementing Kari's Law and RAY BAUM's Act and its ongoing efforts to update 911 requirements. The proposed Report and Order adopts rules that are technologically neutral and provide service providers and enterprises flexibility, while ensuring greater accuracy in location information for first responders. However, as the Commission moves forward, it is important the Commission does not maintain rules that mandate the perpetuation of legacy systems and technology. Legacy solutions available today are no longer the only option. In fact, many new technologies provide dispatchable data in a manner that supersedes legacy systems and databases.

The Commission should ensure that any technology that provides data that is compliant with NENA i3 specifications is an acceptable means for conveying dispatchable location and other location detail as part of a transition to NG 911. Avaya has added the capability to communicate with NENA i3 compliant ADR infrastructure, such as that deployed with RapidSOS, which not only solves the problem of situational awareness and discreet station location, but also enables a forward compatible path for NG 911 communications that includes multimedia. Over the top solutions can likewise provide compliant location information in a cost-effective manner without the need for legacy systems.

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<sup>1</sup> 47 C.F.R. § 1.1206.

Accordingly, while Avaya supports the FCC's technology neutral focus in the proposed Report and Order, Avaya encourages the Commission to move away from mandatory use of legacy systems as it continues to transition the current 911 environment to NG 911.

Respectfully submitted,

/s/

Michael P. Donahue

*Counsel for Avaya, Inc.*